



January 31, 2005

Washington State Department of Agriculture
Endangered Species Program
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Dear WSDA,

I'm writing on behalf of our 38,000 members and other shoppers who frequent our seven grocery stores. Sustainable runs of wild salmon are an important part of our offering and it's vital to our business that WSDA does all it can to protect the wild salmon in our streams.

Our organization first commented on the *Process for Evaluating Pesticides in Washington State Surface Waters for Potential Impacts to Salmonids* in May 2001. We were pleased that WSDA was moving to evaluate the effects of pesticides on wild salmon. As you know, the US Geological Survey found 13 pesticides at levels that exceed criteria set to protect aquatic life, and others were detected at levels shown by scientific criteria to be harmful to salmon.

The recent draft State Initiated Plan (SIP) is therefore very disturbing and disappointing. Rather than follow through on the Task Force promise to reduce impacts, the draft plan sets an opposite priority – "to ensure pesticide use remains available as a tool for agricultural production..." This is not the process presented when selling it to the public.

We now urge you to:

- 1) Ban, phase-out or dramatically restrict pesticides that pollute salmon streams, especially the most hazardous pesticides.
- 2) Adopt a precautionary approach through rulemaking to prevent pesticides from entering waterways where there's any uncertainty about the impacts on salmon.
- 3) EPA consultations should be based on allowed uses communicated on pesticide labels as a baseline for exposure, not on lesser, speculative "scenarios." Maximum use rates -- allowed on the labels -- must be the baseline for harm.

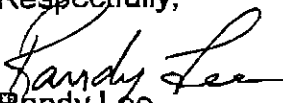


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- 4) WSDA should use its surface water monitoring program to provide information based on science, not to minimize a perceived threat of pesticide contamination to make the public think pesticides don't pollute our waters. While it's technically true that certain pesticides were not detected in 96 percent of the tests conducted, it's highly misleading to state pesticides were not detected in 96 percent of the "water samples," as WSDA said. The report showed in fact that pesticides were found in 100 percent of the samples taken from the streams -- quite a different story indeed.

Wild salmon are by far the best-selling seafood item in our stores. As the regulator in this important matter, we urge you to keep the public trust and stay the course with your promise to reduce pesticide contamination. Your actions are critical to our economy, the health of consumers, and the environment as a whole.

Respectfully,



Randy Lee

Chief Financial Officer